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ADMITTED TO PRACTICE
New York State
Eastern District of New York
Southern District of New York

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May 30, 2023

UNDER SEAL

Via: Email: shields_chambers@nyed.uscourts.gov

United States Magistrate Judge Anne Y. Shields
100 Federal Plaza, Courtroom 840
Central Islip, New York 11722

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ MAY 30 2023 ★

LONG ISLAND OFFICE

Re: U.S. v. George Santos, 23-CR-197(JS)(AYS)
Request to modify defendant's bail conditions

Your Honor:

I am the attorney for Congressman George Santos, the defendant in the above referenced criminal matter. I write to respectfully request to modify my client's bail conditions with the consent of the Government. The procedural history of this request is as follows.

On May 10, 2023, my client was arraigned on the indictment filed in this case wherein the conditions of my client's release required, among other things, that my client and three financially responsible people co-sign a \$500,000.00 unsecured bond. At arraignment, I identified two sureties who were not present in court but were previously interviewed by me and the Government. We were granted until the following Friday, May 19, 2023, to engage our third surety.

On May 15, 2023, we subsequently presented two financially responsible family members who were interviewed by this Court, on the record, and co-signed the bond during a closed courtroom proceeding, which was subsequently sealed.

On May 22, 2023, via letter under seal, we requested an extension of our May 19, 2023 deadline to engage our third suretor cosigner, to May 30, 2023, which the Government had no objection to, and this Court granted.

Today, May 30, 2023, due to ongoing difficulties in engaging our third suretor cosigner which we have already shared with the Government, we now request to modify my client's bail conditions by removing the requirement for a third suretor cosigner. AUSA Ryan Harris has authorized me to include that the Government has no objection to our request to remove the requirement of a third suretor.

In that this request involves a matter currently under seal, I respectfully request that the Court file this letter under seal.

Please feel free to contact me with any questions you may have.

Respectfully,



Joseph W. Murray, Esq.

Cc:

- AUSA Ryan Harris via email: ryan.harris2@usdoj.gov
- AUSA Anthony Bagnuola via email: anthony.bagnuola@usdoj.gov
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